6890 E. Sunrise Drive, #120-10 Tucson, Arizona 85715 (520) 299-9808

June 2, 1995

Mr. Gene Hill Hammontree & Associates, LTD. 5233 Stoneham Rd. North Canton, Ohio 44720

RE: Canton Drop Forge Bioremediation Project.

Dear Gene,

The following is a response to your comments and questions regarding the Canton Drop Forge bioremediation project as outlined in your letter on May 19, 1995.

1. TIME FRAME:

- A. To better serve Canton Drop Forge, The Critter Company has already designed and manufactured over 200 lbs. of oil eating microbes to start this project. Additional microbes will be grown on-site throughout the duration of the project.
- B. Upon signing of the contract, The Critter Company will have Beaver Excavating build the Bio-Cell. This will take 2 to 3 days. Work can commence within 5 days of signing of the contract.
- C. The Critter Company will then seed the bottom of the Bio-Cell with nutrients and oil eating microbes prior to any material from Lagoons 1 or 2 entering the cell. Beaver Excavating will then proceed to excavate sludge material from Lagoon 1, transport material to the Bio-Cell, and spread it out over the Bio-Cell. It will take approximately 2 weeks to build the Bio-Cell and completely empty Lagoon 1.
- D. If additional space exists in the Bio-Cell, The Critter Company, with permission from Canton Drop Forge, will have Beaver Excavating transport the material from Lagoon 2 into the Bio-Cell until it has reached full capacity. The Critter Company and Beaver Excavating estimate that no more than 4,500 cubic yards will fit into the Bio-Cell. Contaminated soils will be spread throughout the Bio-Cell at a depth of 18-22 inches. A 3 foot dike will be constructed around the entire cell to prevent run-off.

2. WORK PLAN & SCHEDULE:

- A. Pumping The Critter Company asks that Canton Drop Forge remove as much of the water from Lagoons 1 and 2 out as possible prior to Beaver Excavating removing sludge material.
- B. Rain Unless several inches of rain falls within a 24-48 hour period, we do not foresee weather adversely affecting removal of sludge.
- C. Layout of Bio-Cell The layout and location of the Bio-Cell will be dependent upon how much land can be allocated by Canton Drop Forge for this project. The Critter Company will ask Keith Houseknect or an other representative from Canton Drop Forge be on-site during the building of the Bio-Cell in order to mark boundaries for the excavation crew. Currently, several large pieces of CDF equipment occupy the space where the Bio-Cell will be constructed. Therefore, The Critter Company cannot outline the exact boundaries of the cell at this time. However, it is our understanding from Keith Houseknect that the cell can be constructed around each piece of equipment.

D. Time Frame:

- -2 Weeks to build Bio-Cell and empty Lagoon 1 and part of Lagoon 2.
- -Bioremediation treatments will be made approximately once a week.
- -Tilling or turning over soil will be done approximately once a week.
- -Sampling will be conducted once a month by Hammontree & Associates.
- -Treatment process for the first 4,500 cubic yards should take between 3-6 months of warm weather.
- -The second 4,500 cubic yards will follow the same schedule.
- 3. PERMITTING: Permitting will not be necessary for the bioremediation portion of this project.
- 4. BULKING: While The Critter Company does not anticipate to bulk any sludge material with native soils, we will need to add between 1/2 1 1/2 tons of a fertilizer and nutrient mixture.
- 5. SAMPLING AND ANALYSIS: The Critter Company requests that the EPA 418.1 method be run in conjunction with a GC method. We have two concerns about the 418.1 method. First, this method has a long history of yielding unpredictable and unreliable results. The Critter Company can provide documentation of the problems surrounding 418.1. Second, this method is expected to be abolished before the end of this project.

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If you have any questions or need additional information, please do not hesitate to call me at (614) 431-8190 or Jerry Coon at (520) 299-9808.

Sincerely,

THE CRITTER COMPANY, INC.

Scott Klingensmith

Project Coordinator